

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TAJI GRANT,

Plaintiff,

Case No. 20-cv-00009 (LTS)(JLC)

- against -

CANON BUSINESS PROCESS SERVICES, INC.  
and SUSAN BANKS, *Individually*,

**STIPULATION TO ARBITRATE**  
**CLAIMS AND STAY ACTION**

Defendants.

This Stipulation is entered into by and between Plaintiff Taji Grant (“Plaintiff”) and Defendants Canon Business Process Services, Inc. (“Canon”) and Susan Banks (“Banks”) (Canon and Banks together, “Defendants,” and with Plaintiff, the “Parties”), through their undersigned counsel.

WHEREAS, on January 9, 2020, Plaintiff filed a complaint against Defendants in the District Court for the Southern District of New York, which was designated by this Court as Case No. 20-cv-00009 (LTS)(JLC) (the “Action”), asserting three causes of action: (1) discrimination in violation of Title VII of the Civil Rights Act of 1964; (2) discrimination in violation of the New York City Human Rights Law (“NYCHRL”); and (3) retaliation in violation of the NYCHRL.

WHEREAS, on May 8, 2020, Defendants filed a Motion to Dismiss Plaintiff’s Complaint and Compel Arbitration in lieu of an answer to the Complaint.

WHEREAS, the Parties subsequently conferred, and Plaintiff agreed to submit the Action to final and binding arbitration in accordance with Canon’s Dispute Resolution Policy.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties, through their undersigned counsel, that Plaintiff will submit all claims she asserts in the Action to final and binding arbitration.

IT IS FURTHER STIPULATED AND AGREED that this Action shall be stayed pending resolution of the arbitration.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be filed in counterparts with any facsimile or electronic signature deemed to be original.

**YURIY MOSHES, P.C.**

/s Jessenia Maldonado  
Jessenia Maldonado  
517 Brighton Beach Avenue  
Brooklyn, NY 11235  
(888) 445-0234

*Attorneys for Plaintiff*

Dated: June 5, 2020

The request to stay the action pending arbitration is granted. The parties must file a joint status report as of December 1, 2020, and each June 1 and December 1 thereafter, indicating whether this action should remain stayed, be restored to the active calendar, or be dismissed. DE# 16 terminated as moot; DE#19 resolved.

SO ORDERED:

/s/ Laura Taylor Swain, USDJ 6/5/2020  
Hon. Laura T. Swain, U.S.D.J.

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**JACKSON LEWIS P.C.**

/s Clifford R. Atlas  
Clifford R. Atlas  
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*Attorneys for Defendants*

Dated: June 5, 2020